



**LIGHTINGEUROPE**

THE VOICE OF THE LIGHTING INDUSTRY

**Position paper on  
lamp labelling under  
regulation (EU) No  
874/2012 (Energy  
Label)**

**6 May 2013**

**Changes from the new energy  
labelling regulation on  
products labelled under  
98/11/EC (old label)**

## **Objective:**

The purpose of this paper is to provide information about the consequences of the new, more stringent European Energy Efficiency Labelling regulation, in particular about the change of Energy Efficiency Classes for certain Mains Voltage Halogen lamps.

## **Background**

The European Commission has published the new energy labelling regulation (EU) No 874/2012 that replaces the lamps energy label 98/11/EC from 1998.

The existing label for household lamps was extended with new efficiency classes A+ and A++ (A+++ is reserved for a later stage) and now covers most lamp types as well as luminaires.

The new regulation may lead to a reclassification of some products, when compared to the current Energy Efficiency Label.

LightingEurope supports the introduction of this revised regulation on Energy Efficiency Labelling.

In the current energy label regulation, the energy efficiency index was calculated with the rated luminous flux and the rated power input as it was defined in international standards. The revised Energy Efficiency regulation 874/2012 is now introducing new evaluation criteria, disallowing the use of any tolerances when designing the product. Furthermore, the revised Regulation is establishing an amended description of the verification procedure established for market surveillance purposes.

Due to these new rules, some products which are on the lower limit of a certain class in the current directive 98/11/EC, either need to be reclassified to a lower efficiency class or need to be technically improved to fulfil the new Energy Efficiency Labelling requirements as laid down in 874/2012.

## **Consequences for lamps**

Thorough analysis of the technologies and products supplied to the market by members of LightingEurope show that for certain lamps the revised Regulation might result in a lower energy class. Pending further analysis, LightingEurope expects issues for specific types of compact fluorescent and low pressure discharge lamps.

However, this is especially true for Mains Voltage Halogen lamps:

Non-directional Mains Voltage Halogen lamps are so close to the lower limit of Energy Efficiency class C that, due to the approach of the revised Regulation, **the vast majority of non-directional Mains Voltage Halogen lamps, have to be reclassified under the revised Regulation and will fall into class D.**

The most common non-directional Mains Voltage halogen lamps are E14, E27, B15d, B22d (replacing incandescent light bulbs) G9 and R7s.

**Non-directional Mains Voltage Halogen E14, E27, B15d, B22d, G9 and part of R7s lamps for household use manufactured on the current state of the art and showing the new energy label can be considered as non-compliant if they are classified as class C.**

This position does not preclude the putting on the market of those Mains Voltage Halogen lamp types that can achieve higher classes than “D”.

LightingEurope members do not see any possible improvements for these lamps to achieve class C without jeopardizing other product specifications like lifetime and luminous flux. Therefore everyone supplying these lamps to the market as well as market surveillance authorities and customs are requested to test these lamps according to the new requirements, and pay extra attention to those products on the market with class C in combination with the new energy label (meaning any label on lighting products showing classes A++ to E). This applies to most lamps placed on the market as of September 1st, 2013.

### **Compliance with Ecodesign regulations**

Whether a lamp is allowed on the European market according to Ecodesign regulation 244/2009 does not depend on the declared or actual energy efficiency class. Rather, it is determined by the requirements of energy use, performance and on-pack information in these regulations. Consequently, non-directional Mains Voltage Halogen lamps as mentioned above with a revised energy class D can still be fully compliant with the Ecodesign regulations.

(That means that the common simplification “C class halogen is compliant, D class is not”, no longer holds true for the new energy label.)

### **In short:**

1. Members of LightingEurope conclude, based on a common understanding and interpretation of the applicable law, that as per September 1st, 2013, non-directional Mains Voltage Halogen E14, E27, B15d, B22d, G9 and part

of R7s lamps from LightingEurope members change from Energy Efficiency class C to class D.

2. These products will still remain fully compliant with Ecodesign regulation 244, also after September 1<sup>st</sup>, 2013.
3. Any supplier or trader offering class C products of the above mentioned types after September 1<sup>st</sup>, 2013 is most likely offering products that are not compliant with the revised Energy Efficiency regulation 874/2012 and should be subject to scrutiny by national surveillance authorities.
4. With this distinction between class C and D products, potential non-compliance with the revised Energy Efficiency regulation 874/2012 is easy to identify for Mains Voltage halogen lamps.